

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTIAN DIOR COUTURE, S.A.,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No. 21-cv-05133

Judge Gary Feinerman

Magistrate Judge M. David Weisman

PRELIMINARY INJUNCTION ORDER

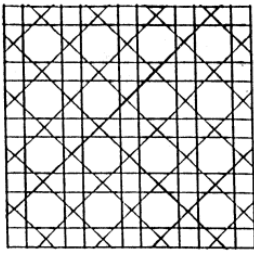
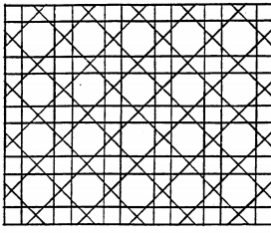
THIS CAUSE being before the Court on Plaintiff Christian Dior Couture, S.A.’s (“Plaintiff” or “Dior”) Motion for Entry of a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS Plaintiff’s Motion for Entry of a Preliminary Injunction in its entirety against the fully interactive, e-commerce stores¹ operating under the seller aliases identified on Schedule A attached hereto (collectively, the “Seller Aliases”).

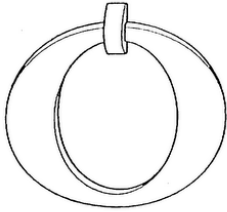

The Court finds that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars, and, on information and belief, have sold products bearing unauthorized copies of the Dior Copyrighted Designs (including U.S. Copyright Registration Nos. VA 657-906, VA 655-762, VA 657-903, VA

¹ The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces and Domain Names.

657-904, and VA 657-905) and/or using infringing and counterfeit versions of the CHRISTIAN DIOR Trademarks (a list of which is included in the chart below) to residents of Illinois.

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
543,994	CHRISTIAN DIOR	June 19, 1951	For: Handbags and pocketbooks in Class 018.
580,207	CHRISTIAN DIOR	September 22, 1953	For: Jewelry for personal wear, not including watches—namely, trinkets, necklaces, bracelets, finger rings, earrings, brooches, and ornamental clips made in whole of, in part of, or plated with precious metals in class 014.
954,404	CHRISTIAN DIOR	March 6, 1973	For: Eyeglass frames, sunglasses and eyeglass cases in Class 009.
1,123,944	CD	August 14, 1979	<p>For: Optical apparatus – namely, eyeglass frames in Class 009.</p> <p>For: Jewelry and horological instruments – namely, women’s costume jewelry, bracelets, and watches for men and women in Class 014.</p> <p>For: Articles made from leather and imitations thereof, namely, luggage for men and women in Class 018.</p> <p>For: Women’s blouses, skirts, dresses, jackets, suits, coats; Men’s suits, belts and sport jackets in Class 025.</p>

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
1,776,536		June 15, 1993	<p>For: Carry-on bags; change purses; clutch bags; clutch purses; golf umbrellas; handbags; luggage; passport cases, holders or wallets; pocketbooks; purses; shoulder bags; all-purpose sports bags; suitcases; tote bags; travel bags; and wallets in Class 018.</p> <p>For: Clothing for use by men, women and children; namely, blouses; gloves; vests in Class 025.</p>
1,872,313		January 10, 1995	<p>For: Eyeglass frames and parts thereof; sunglasses in Class 009.</p> <p>For: Rings in Class 014.</p>
1,923,564	Dior	October 3, 1995	<p>For: Belt buckles of precious metals for clothing; brooches; charms; costume jewelry; ear clips; jewelry; jewelry lapel pins; ornamental pins; pendants; watch bands; watch chains; watch fobs; and watches in Class 014.</p> <p>For: billfolds; business card cases; carry-on bags; change purses; clutch bags; clutch purses; coin purses; credit card cases; drawstring pouches; handbags; key cases; overnight bags; passport cases, holders or wallets; purses; shoulder bags; and wallets in Class 018.</p>

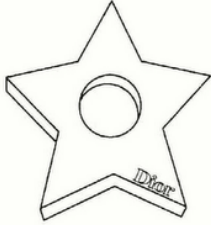

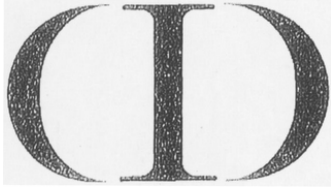
REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
2,240,163		April 20, 1999	For: clutch bags, change purses, pocketbooks, purses, wallets in class 018.
3,561,323	Dior	January 13, 2009	For: optical apparatus and instruments, namely, spectacles, sunglasses, spectacle cases, and spectacle frames in Class 009.
2,749,176		August 12, 2003	For: Athletic bags; attache cases; baby carriers worn on the body; backpacks; beach bags; beach umbrellas; billfolds; book bags; briefcase-type portfolios; briefcases; business card cases; carry-on bags; non-motorized collapsible luggage carts; change purses; clutch bags; clutch purses; coin purses; cosmetic cases sold empty; credit card cases; diaper bags; document cases; drawstring pouches; duffel bags; fanny packs; felt pouches; garment bags for travel; golf umbrellas; gym bags; handbags; hat boxes for travel; key cases; knapsacks; luggage; overnight bags; overnight cases; parasols; passport cases, holders and wallets; patio umbrellas; pocketbooks; purses; satchels; school bags; shoe bags for travel; leather shopping bags; mesh shopping bags; textile shopping bags; shoulder bags; all-purpose sports bags; suitcases; toiletry cases sold

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			<p>empty; tote bags; travel bags; trunks for traveling; umbrellas; valises; vanity cases sold empty; waist packs; wallets in Class 018.</p> <p>For: Clothing for use by men, women and children; namely, anoraks; aprons; ascots; babushkas; bandannas; bathing suits; bathrobes; belts; blazers; blouses; blousons; bodysuits; boleros; boots; boxer shorts; brassieres; briefs; baby buntings; caftans; camisoles; capes; caps; cardigans; chemises; clogs; cloth diapers; fur coats; suit coats; top coats; corselets; culottes; dresses; earmuffs; galoshes; garter belts; girdles; gloves; nightgowns; halter tops; hats; headbands; hosiery; jackets; jeans; jogging suits; jumpers; jumpsuits; kerchiefs; kimonos; leggings; leotards; loungewear; mittens; moccasins; mufflers; neckerchiefs; neckties; neckwear; negligees; nightshirts; overalls; overcoats; overshoes; pajamas; panties; pants; pantsuits; pantyhose; parkas; pedal pushers; peignoirs; pinafores; playsuits; pocket squares; ponchos; pullovers; raincoats; sandals; scarves; shawls; shirts; shorts; undershirts; shoes; sweat shorts; skirts; ski suits; slacks; snowsuits; socks; sport coats; sport shirts; stockings; stoles; suits; suspenders; sweat pants;</p>


REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			sweatshirts; sweaters; t-shirts; trousers; tuxedos; underpants; vests; vested suits; and warm-up suits in Class 025.
5,173,476	DIOR SO REAL	April 4, 2017	<p>For: Eyeglasses, sunglasses, goggles for sports; spectacle frames, spectacle cases; containers for contact lenses; protective cases, bags, satchels and covers for computers, tablets, mobile telephones and MP3 players in Class 009.</p> <p>For: Jewelry; precious stones; precious metals and their alloys, jewelry bracelets, jewelry brooches, jewelry necklaces, jewelry chains, medals, pendants, earrings, rings, charms, tie pins; cuff links; key rings of precious metals; jewelry cases; boxes of precious metal; boxes, cases and presentation cases for timepieces and jewelry; timepieces, chronometric instruments, watches, watch bands in Class 014.</p> <p>For: Leather and imitation leather; animal skins and furs; trunks and suitcases; wallets; coin purses; credit card holders; briefcases of leather or imitation leather; key cases of leather or imitation leather; garment bags for travel; all-purpose carrying bags, backpacks, handbags, traveling bags; vanity cases sold empty; clutch bags of leather; toiletry and make-up bags sold empty; boxes of</p>

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			leather; umbrellas in Class 018.
5,505,434	J'ADIOR	July 3, 2018	<p>For: Eyeglasses, sunglasses, goggles for sports; spectacle frames, spectacle cases; protective cases, bags, satchels and covers for computers, tablets, mobile telephones and MP3 players; cases for telephones, protective cases for telephones in Class 009.</p> <p>For: Jewelry, jewelry articles; precious and semi-precious stones; pearls; precious metals and their alloys; items of jewelry, namely, bracelets, brooches, necklaces, chains, medals, pendants, earrings, rings, and charms; tie pins; cuff links; key rings; jewelry cases; boxes of precious metals; presentation boxes and cases for jewelry and timepieces; timepieces; chronometric instruments; watches; watch bands; watch dials; chronographs in Class 014.</p> <p>For: Leather and imitation leather; animal skins and fur pelts; trunks and suitcases; wallets; coin purses; credit card holders; briefcases of leather or imitation leather; attaché cases and document cases of leather and imitation leather; protective covers for clothing, namely, garment bags for travel; key cases of leather or imitation leather; all-purpose carrier bags;</p>

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			<p>backpacks; handbags; traveling bags; vanity cases sold empty; clutch bags of leather; traveling sets being luggage of leather; toiletry and make-up bags sold empty; leather boxes not being jewelry boxes; umbrellas; shoulder belts of leather in Class 018.</p> <p>For: Clothing, namely, layettes, bibs not of paper, bath robes, bathing suits, shorts, belts, suspenders, blouses, cardigans, trousers, overalls, combinations, shirts, t-shirts, skirts, polo shirts, pullovers, vests, dresses, coats, tailleurs, parkas, overcoats, blousons, jackets, underwear, furs being clothing, wedding dresses, gloves, mittens, scarves, stoles, sashes for wear, shawls, neckties, collars, caps, hats, visors, hosiery, men's suits, ponchos, raincoats, socks, tights, leggings, pajamas, tracksuits, cuffs, and bedroom slippers; footwear; beach, ski, and sports footwear; boots; ankle boots; sandals; pumps being footwear; esparto shoes and sandals; headbands; headwear; headgear being knitted caps; clothing for sports, namely, shorts and shirts; clothing for children, namely, hats, shorts, dresses, and shoes in Class 025.</p>

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
3,002,132		September 27, 2005	For: Jewelry; jewelry chains; charms, medals; pins being jewelry in Class 014.
2,790,589		December 9, 2003	<p>For: Optical apparatus and instruments, namely, spectacles, sunglasses in Class 009.</p> <p>For: Precious metals in general and their alloys sold in bulk; precious metals and their alloys sold at retail; jewelry, charms, medals in Class 014.</p> <p>For: Clothing for use by men, namely, blousons; boxer shorts; cardigans; neckties; neckwear; pants; pullovers; scarves; shirts; shorts; sweat shorts; sport shirts; sweatshirts; sweaters; t-shirts; trousers in Class 025.</p>
4,541,171		June 3, 2014	<p>Spectacles being optics; optical goods, namely, spectacles, sunglasses, anti-glare goggles for use in sports, sports eyewear, spectacle cases; telephone peripherals, namely, cases, telephone earphones and microphones in Class 009.</p> <p>Jewelry; precious and semi-precious stones and imitations thereof, timepieces and chronometric instruments, precious metals and alloys</p>

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			<p>thereof; works of art of precious metal; jewelry cases of precious metal; boxes of precious metal; watch cases, bracelets, chains, springs or glasses; key rings being trinkets or fobs of precious metal; cases or presentation cases, namely, boxes for timepieces; medals; charms; earrings made of precious metals in Class 014.</p> <p>Leather and imitations of leather; trunks and suitcases; [umbrellas, parasols and walking sticks;] wallets; purses, namely, coin purses; handbags, backpacks, wheeled bags; bags for climbers and campers in the nature of all-purpose carrying bags; travel bags, beach bags, school bags; card cases being wallets; vanity cases sold empty; key cases as leather goods; textile bags or mesh bags for shopping; bags or small bags, namely, envelopes, pouches of leather for packaging in Class 018.</p> <p>Clothing, namely, t-shirts, blouses, jeans, pants, socks, shorts, underwear, shirts, neckties, sweaters, pullovers, skirts, trousers, coats, jackets, rainproof jackets and coats, scarves, waistcoats, ski suits, swimming costumes; headgear, namely, hats, caps; leather or imitation leather clothing, namely, pants, dresses, skirts, trousers, coats,</p>

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			jackets, gloves; belts being clothing; fur coats; gloves being clothing in Class 025.
4,853,081		November 17, 2015	<p>Spectacles; optical goods, namely, sunglasses, anti-glare goggles for use in sports, sport eyewear, optical lenses and glasses; spectacle frames; spectacle cases; portable telephones; telephone apparatus, namely, cases, telephone earphones and microphones; chains for spectacles in Class 009.</p> <p>Jewelry; precious and semi-precious stones and imitations thereof; timepieces and chronometric instruments, precious metals and alloys thereof; works of art of precious metal; jewelry cases; boxes of precious metal; watch cases, bracelets, chains, springs and glasses for watches; key rings trinkets and fobs of precious metals; statues, figurines and statuettes of precious metals; cases and presentation cases for timepieces; medals; charms; buckles of precious metal for jewelry in Class 014.</p> <p>Leather and imitation leather; animal skins, pelts and hides; trunks and suitcases; umbrellas, parasols; wallets; coin purses; handbags; backpacks; wheeled bags; all-purpose carrying bags; travel bags, beach bags, school bags; business card cases; unfitted</p>

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			vanity cases; key cases; textile and mesh bags for shopping; bags and small bags in the nature of envelopes and pouches of leather for packaging; envelopes and pouches of leather for packaging in Class 018. Clothing, namely, shirts, pants, jackets, socks, underwear, pull-overs, skirts, dresses, coats; footwear; headwear, namely, hats, caps; leather clothing, namely, jackets, coats, dresses, skirts, pants, hats, gloves; belts; furs, namely, fur coats, fur jackets, fur hats, fur stoles; gloves; scarves; neckties; hosiery; socks; bedroom slippers; beach, ski and sports footwear; underwear in Class 025.

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order (“TRO”) should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Dior’s previously granted Motion for Entry of a Temporary Restraining Order establishes that Dior has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Dior will suffer irreparable harm if the injunction is not granted. Specifically, Dior has proved a *prima facie* case of trademark infringement because (1) the CHRISTIAN DIOR Trademarks are distinctive marks and are registered with the U.S. Patent and Trademark Office on the Principal Register, (2)

Defendants are not licensed or authorized to use any of the CHRISTIAN DIOR Trademarks, and (3) Defendants' use of the CHRISTIAN DIOR Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with Dior. Furthermore, Defendants' continued and unauthorized use of the CHRISTIAN DIOR Trademarks irreparably harms Dior through diminished goodwill and brand confidence, damage to Dior's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Dior has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions. As such, this Court orders that:

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under or in active concert with them be preliminarily enjoined and restrained from:
 - a. using the CHRISTIAN DIOR Trademarks or any reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Dior product or not authorized by Dior to be sold in connection with the CHRISTIAN DIOR Trademarks;
 - b. reproducing, distributing copies of, making derivative works of, or publicly displaying the Dior Copyrighted Designs in any manner without the express authorization of Dior;
 - c. passing off, inducing, or enabling others to sell or pass off any product as a genuine Dior product or any other product produced by Dior, that is not Dior's or not produced under the authorization, control or supervision of Dior and approved by Dior for sale under the CHRISTIAN DIOR Trademarks and/or the Dior Copyrighted Designs;

- d. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Dior, or are sponsored by, approved by, or otherwise connected with Dior;
 - e. further infringing the CHRISTIAN DIOR Trademarks and/or the Dior Copyrighted Designs and damaging Dior's goodwill; and
 - f. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Dior, nor authorized by Dior to be sold or offered for sale, and which bear any of Dior's trademarks, including the CHRISTIAN DIOR Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof and/or which bear the Dior Copyrighted Designs.
2. The domain name registries for the Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet, and the Public Interest Registry, within ten (10) business days of receipt of this Order, shall, at Dior's choosing:
- a. unlock and change the registrar of record for the Domain Names to a registrar of Dior's selection until further ordered by this Court; or
 - b. disable the Domain Names and make them inactive and untransferable until further ordered by this Court.
3. The domain name registrars, including, but not limited to, GoDaddy Operating Company, LLC ("GoDaddy"), Name.com, PDR LTD. d/b/a PublicDomainRegistry.com ("PDR"), and Namecheap Inc. ("Namecheap"), within ten (10) business days of receipt of this Order, shall take any steps necessary to transfer the Domain Names to a registrar account of Dior's

selection so that the Domain Names can be redirected or disabled until further ordered by this Court.

4. Upon Dior's request, any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of the Online Marketplaces and Domain Names, including, without limitation, any online marketplace platforms such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com ("Wish.com"), and Dhgate, (collectively, the "Third Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Dior expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:
 - a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information, and all associated e-mail addresses;
 - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces, Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces and Domain Names; and
 - c. any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions including, without limitation, PayPal, Inc. ("PayPal"), eBay, Alipay,

Alibaba, Ant Financial Services Group (“Ant Financial”), Amazon Pay, Wish.com or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

5. Upon Dior’s request, those with notice of the injunction, including the Third Party Providers as defined in Paragraph 4, shall, within ten (10) business days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the CHRISTIAN DIOR Trademarks and/or which bear the Dior Copyrighted Designs.
6. Defendants shall be temporarily and preliminarily restrained and enjoined from transferring or disposing of any money or other of Defendants’ assets until further ordered by this Court.
7. Any Third Party Providers, including PayPal, eBay, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within ten (10) business days of receipt of this Order:
 - a. locate all accounts and funds connected to Defendants, the Seller Aliases, Online Marketplaces and Domain Names, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto; and
 - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants’ assets until further ordered by this Court.
8. Dior is authorized to issue expedited written discovery, pursuant to Federal Rules of Civil Procedure 33, 34 and 36, related to:
 - a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them,

including all known contact information, including any and all associated e-mail addresses; and

- b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces, Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces and Domain Names.

Dior is authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within ten (10) business days of being served via e-mail.

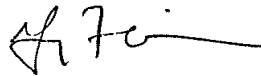
9. Dior may provide notice of these proceedings to Defendants, including service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Complaint, this Order and other relevant documents on a website to which the Domain Names which are transferred to Dior's control will redirect, or by sending an e-mail with a link to said website to the Defendants. The Clerk of the Court is directed to issue a single original summons in the name of "The Partnerships and all other Defendants identified in the Complaint" that shall apply to all Defendants. The combination of providing notice via electronic publication or e-mail, along with any notice that Defendants receive from domain name registrars and payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.
10. Schedule A to the Complaint [2], Exhibits 5 and 6 to the Declaration of Nicolas Lambert [13], [14], and the TRO are unsealed.

11. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and Northern District of Illinois Local Rules.

12. The \$10,000 bond posted by Dior shall remain with the Court until a Final disposition of this case or until this Preliminary Injunction is terminated.

IT IS SO ORDERED.

Dated: November 2, 2021

A handwritten signature in black ink, appearing to read 'G. Feinerman', written over a horizontal line.

Gary Feinerman
United States District Judge

**Christian Dior Couture, S.A. v. The Partnerships and Unincorporated Associations Identified on
Schedule "A" - Case No. 21-cv-05133**

Schedule A

Defendant Online Marketplaces		
No	URL	Name / Seller Alias
1	firstmadam.en.alibaba	Fuzhou Ponerine Global Trade Co., Ltd.
2	galiyajewelry.en.alibaba	Guangzhou Galiya Jewelry Factory
3	mangoo.en.alibaba	Yiwu Maimang Jewelry Co., Ltd.
4	aliexpress.com/store/1048071	Yi Han BaBy Shop
5	aliexpress.com/store/1298499	Shop1298499 Store
6	aliexpress.com/store/1821116	K&L Drop shopping Store
7	aliexpress.com/store/2495023	JGSHOWKITO Official Store
8	aliexpress.com/store/2662122	Bickmods Official Store
9	aliexpress.com/store/2882013	OOPSMILE Store
10	aliexpress.com/store/2959037	Z-C-H-Leisure Apparel Store
11	aliexpress.com/store/3088066	Verlena Official Store
12	aliexpress.com/store/3240031	easierbaby01 Store
13	aliexpress.com/store/3509022	CUBUSE BABY Store
14	aliexpress.com/store/3892049	JESBOOW Official Store
15	aliexpress.com/store/4488138	MOONBIFFY jewelryFun-888 Store
16	aliexpress.com/store/4661130	Shop4661130 Store
17	aliexpress.com/store/4713042	Terry Store
18	aliexpress.com/store/4967063	Handsome&Baby Store
19	aliexpress.com/store/5018042	Z-888888 Store
20	aliexpress.com/store/5100147	LPEJLHY Store
21	aliexpress.com/store/5121115	Shop5121115 Store
22	aliexpress.com/store/5139057	The North Pole Lass Official Store
23	aliexpress.com/store/5260205	Shop5260205 Store
24	aliexpress.com/store/5261207	Yu Shen Store
25	aliexpress.com/store/5439305	ZXRGZHU Official Store
26	aliexpress.com/store/5441016	Kingbc Store
27	aliexpress.com/store/5494150	Children Footwear Store
28	aliexpress.com/store/5514083	Shop5514083 Store
29	aliexpress.com/store/5578058	TITAME Store
30	aliexpress.com/store/5593033	Spider Electron Store
31	aliexpress.com/store/5607112	Shop5607112 Store
32	aliexpress.com/store/5657001	Semalaya888 Store
33	aliexpress.com/store/5742007	SHENCE Store
34	aliexpress.com/store/5789673	Kalorzze yuanchenghong Store
35	aliexpress.com/store/5791048	The global children's clothes Store
36	aliexpress.com/store/5794766	xmyuelan Store

37	aliexpress.com/store/5795632	Shop5795632 Store
38	aliexpress.com/store/5835285	Better-Island Store
39	aliexpress.com/store/5882582	Shop5882582 Store
40	aliexpress.com/store/5892492	Finded Store
41	aliexpress.com/store/629040	JJ Women Blouses Store
42	aliexpress.com/store/900246106	Shop900246106 Store
43	aliexpress.com/store/910315161	ZIYOU RONGYAO Store
44	aliexpress.com/store/910331100	Boutique menswear Store
45	aliexpress.com/store/910449207	Cassiol Store
46	aliexpress.com/store/910554315	Shop910554315 Store
47	aliexpress.com/store/910563069	Shop910563069
48	aliexpress.com/store/910728124	Shop910728124 Store
49	aliexpress.com/store/910960038	Wearable93 Store
50	aliexpress.com/store/911066061	OneGuest Store
51	aliexpress.com/store/911103004	SKtwo Store
52	aliexpress.com/store/911108295	COZOK Meetingherat Store
53	aliexpress.com/store/911136278	CNpeace Store
54	aliexpress.com/store/911183001	Shop911183001 Store
55	aliexpress.com/store/911218004	Shop911218004 Store
56	aliexpress.com/store/911334168	Shop911334168 Store
57	aliexpress.com/store/911600911	LB888 Store
58	aliexpress.com/store/911602372	HBTianzi Store
59	aliexpress.com/store/911606086	Chang ting Store
60	aliexpress.com/store/911612011	Shop911612011 Store
61	aliexpress.com/store/911658296	OnTheWay Store
62	aliexpress.com/store/911665085	Wheat Brooch Store
63	aliexpress.com/store/911728109	2021haoyun Store
64	aliexpress.com/store/911746636	yrhzpsh Store
65	aliexpress.com/store/911755157	Dazzin Store
66	aliexpress.com/store/911757006	Lilys Store
67	aliexpress.com/store/911769778	Upsport Store
68	aliexpress.com/store/911772283	KKSLJ Store
69	aliexpress.com/store/911795860	letianf888 Store
70	aliexpress.com/store/911825532	Mr. Wu shop Store
71	aliexpress.com/store/911830306	karsha Store
72	aliexpress.com/store/911840315	WTIANYUW Store
73	aliexpress.com/store/911871084	666bags666 Store
74	aliexpress.com/store/911874055	huakaifugui Store
75	aliexpress.com/store/911875017	Filsika Store
76	aliexpress.com/store/911878352	BHY-twinkle Store
77	aliexpress.com/store/911924004	Ollymurs theshyp788 Store
78	aliexpress.com/store/911930671	MJ Mandy Store

79	aliexpress.com/store/911931274	Online Boutique Discount Store
80	aliexpress.com/store/911931786	beijiaqi Store
81	aliexpress.com/store/911935756	beijiaqi001 Store
82	aliexpress.com/store/911935987	Ningmeng-2 Store
83	aliexpress.com/store/911940853	beijiaqi002 Store
84	aliexpress.com/store/911942701	cystal0926 Store
85	aliexpress.com/store/911953017	xingxingmhk Store
86	aliexpress.com/store/911971153	INGYM Store
87	aliexpress.com/store/912007070	pagb&bpga Store
88	aliexpress.com/store/912009046	1541508847 Store
89	aliexpress.com/store/912017290	FuShunLai purse Store
90	aliexpress.com/store/912018465	Beautiful with me Store
91	aliexpress.com/store/912020013	cylxj Store
92	aliexpress.com/store/912022496	BeZeia Assessary Store
93	aliexpress.com/store/912029275	Oownow Store
94	aliexpress.com/store/912031171	ZSMYSAA Official Store
95	aliexpress.com/store/912059479	ATUMN 01 Store
96	aliexpress.com/store/912060200	UVRCOS Yasuk Store
97	aliexpress.com/store/912063137	Timo007 Store
98	aliexpress.com/store/912063293	Bag and Me Store
99	aliexpress.com/store/912063712	We are a shoe factory Store
100	aliexpress.com/store/912072197	yuanzhu520 Store
101	aliexpress.com/store/912073175	yixiangfeng222 Store
102	aliexpress.com/store/912117128	yi nian Store
103	aliexpress.com/store/912119009	qq999iii99 Store
104	aliexpress.com/store/912132014	SODO Store
105	aliexpress.com/store/912135032	SR XIUYUN Store
106	aliexpress.com/store/912140237	8613779951581 Store
107	aliexpress.com/store/912143106	JingTengYouPin Store
108	aliexpress.com/store/912146182	Azptanem2021 Store
109	aliexpress.com/store/912155508	your RR 07 Store
110	aliexpress.com/store/912162077	Gtyo Store
111	aliexpress.com/store/912174348	QXi Mao Yi Store
112	aliexpress.com/store/912174392	XiaoHu(Offer Drop Shipping) Store
113	aliexpress.com/store/912175921	SHIDASHU Store
114	aliexpress.com/store/912178746	hxn 115 Store
115	aliexpress.com/store/912178921	418418 Store
116	aliexpress.com/store/912181370	PalmAngels 456 Store
117	aliexpress.com/store/912183282	ERGHER Store
118	aliexpress.com/store/912183369	QXMYi Store
119	aliexpress.com/store/912183411	TLOFEDI Store
120	aliexpress.com/store/912185022	Fan Yang Store

121	aliexpress.com/store/912186360	cloakroom0414 Store
122	aliexpress.com/store/912186371	weiweiwei Store
123	aliexpress.com/store/912186755	hongqi520 Store
124	aliexpress.com/store/912186914	BP Bags Store
125	aliexpress.com/store/912187302	QuanXi Store
126	aliexpress.com/store/912189429	XUMANJU Store
127	aliexpress.com/store/912189807	AB handbag Store
128	aliexpress.com/store/912193506	huangc215 Store
129	aliexpress.com/store/912200089	Neerpio Store
130	aliexpress.com/store/912202053	laowu001 Store
131	aliexpress.com/store/912207015	Yu Tian Store
132	aliexpress.com/store/912215083	SHEIM Store
133	aliexpress.com/store/912217325	Anjieiun Store
134	aliexpress.com/store/912225026	Is A Shoe Store
135	aliexpress.com/store/912247259	High quality women's shoe Store
136	aliexpress.com/store/912248230	BAOBAOSHIJIA Store
137	aliexpress.com/store/912251323	Baby MuMu Store
138	aliexpress.com/store/912256066	you loving Store
139	aliexpress.com/store/912256941	JialihuaJewelry Store
140	aliexpress.com/store/912257435	Yuppie man Store
141	aliexpress.com/store/912260843	The Girl Shoe Store
142	aliexpress.com/store/912260993	HX-Shoe Store
143	aliexpress.com/store/912262243	DWB 1997 Store
144	aliexpress.com/store/912262573	jpxd Store
145	aliexpress.com/store/912263800	yh004haodian Store
146	aliexpress.com/store/912264676	099 Store
147	aliexpress.com/store/912266478	BB BAG Store
148	aliexpress.com/store/912267654	shop3143534654 Store
149	aliexpress.com/store/912267751	Mon handbags Store
150	aliexpress.com/store/912268054	Lao Fo Ye Store
151	aliexpress.com/store/912269191	678 apparel Store
152	aliexpress.com/store/912270327	Individuality bag Store
153	aliexpress.com/store/912271633	Bestshop 8618529340202 Store
154	aliexpress.com/store/912271870	High-end Shirt Store
155	aliexpress.com/store/912272162	Prettybeauty Store
156	aliexpress.com/store/912272911	T-ZERO Store
157	aliexpress.com/store/912277038	xiaoAA Store
158	aliexpress.com/store/912299043	dfdgfd Store
159	aliexpress.com/store/912311055	All joyy Store
160	aliexpress.com/store/912319116	aoyingmaoyi Store
161	aliexpress.com/store/912320164	Tea is small Store
162	aliexpress.com/store/912323315	MURALON BAGS Store

163	aliexpress.com/store/912328023	ZHANGUUI Store
164	aliexpress.com/store/912341128	QingTian Bag Store
165	aliexpress.com/store/912343495	Somnr18 Store
166	aliexpress.com/store/912346060	goodqualityproduct Store
167	aliexpress.com/store/912348962	MOQO Store
168	aliexpress.com/store/912349523	Icanone Store
169	aliexpress.com/store/912352204	Row Anime Store
170	aliexpress.com/store/912352789	WSNYYDS Store
171	aliexpress.com/store/912353920	the-best-quality Store
172	aliexpress.com/store/912354337	shop 20170109 Store
173	aliexpress.com/store/912369310	Dear's bags Store
174	aliexpress.com/store/912369447	GEWEN Store
175	aliexpress.com/store/912371589	RongHong Store
176	aliexpress.com/store/912395022	DDD666 Store
177	amazon.com/sp?seller=A1R7JBM3IBYF54	Xing Qin
178	amazon.com/sp?seller=A1UUP6Q2BL3FHH	Fkama
179	amazon.com/sp?seller=A2IT8EZSQDD9FP	TRKLUY&
180	amazon.com/sp?seller=A2KFTLWTKNQ6LO	TYUOTT
181	amazon.com/sp?seller=A3VKGG5QCA34L	YIYIshangmao
182	dhgate.com/store/21587598	hstkcc
183	dhgate.com/store/21707357	xinyunsings
184	instagram.com/abagseller_closet	abagseller_closet
185	instagram.com/chaopinhouse3/	chaopinhouse3
186	instagram.com/holydupess/	holydupess
187	instagram.com/best_dupes2021/	best_dupes2021

Defendant Domain Names		
No	URL	Name / Seller Alias
1	brandbagstore.org	brandbagstore.org
2	qualitybag.vip	qualitybag.vip
3	wrgbsale.com	wrgbsale.com
4	ctbbsale.com	ctbbsale.com
5	htdgsale.com	htdgsale.com
6	lqbssale.com	lqbssale.com
7	yjzgsale.com	yjzgsale.com
8	xfgbsale.com	xfgbsale.com
9	zeefsale.com	zeefsale.com
10	channelvonlineparadise.com	channelvonlineparadise.com
11	faymsale.com	faymsale.com
12	luxebagsdirectonlineshop.com	luxebagsdirectonlineshop.com
13	luxedirect.net	luxedirect.net
14	luxedirectonlineshop.com	luxedirectonlineshop.com

15	luxedirectph.com	luxedirectph.com
16	luxeflyshopper.com	luxeflyshopper.com
17	suppurses.com	suppurses.com
18	designershoes.xyz	designershoes.xyz
19	worldleatherdesign.com	worldleatherdesign.com
20	shopiluxefashions.net	shopiluxefashions.net
21	suppurse.vip	suppurse.vip
22	mandybrands-01.com	mandybrands-01.com
23	myhandbaggmall.com	myhandbaggmall.com
24	gtkdsale.com	gtkdsale.com
25	qiwcsale.com	qiwcsale.com
26	luxurysll.com	luxurysll.com
27	thefashionistastyle.com	thefashionistastyle.com
28	ywhgsp.com	ywhgsp.com
29	twotoseven.shop	twotoseven.shop
30	louissells.com	louissells.com
31	phyllisbag.com	phyllisbag.com
32	bezalelemporium.com	bezalelemporium.com
33	thefashionxpress.com	thefashionxpress.com
34	womymoda.com	womymoda.com
35	myluxurybag.net	myluxurybag.net
36	diormizza.com	diormizza.com
37	lvqus.com	lvqus.com
38	amzreps.com	amzreps.com
39	brandstylees.com	brandstylees.com
40	manyluxury.com	manyluxury.com
41	dcbaground.com	dcbaground.com
42	everydesigners.ru	everydesigners.ru
43	getfashion24.com	getfashion24.com
44	luxbag.top	luxbag.top
45	luxoux.com	luxoux.com
46	luxurybrandtop.com	luxurybrandtop.com
47	luxury-dupes.co	luxury-dupes.co
48	nanabag.com	nanabag.com
49	obxob.com	obxob.com
50	proluxuries.com	proluxuries.com
51	richluxuries.com	richluxuries.com
52	sellhot.store	sellhot.store
53	top-luxuryshops.com	top-luxuryshops.com
54	wereplica.ru	wereplica.ru
55	xrepbag.com	xrepbag.com

